



National PROPANE GAS Association

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RSPA-02-12064-8

May 14, 2002

Ms. Susan Gorsky
U.S. Department of Transportation
Office of Hazardous Materials Standards
Research and Special Programs Administration
400 Seventh Street, S.W., Room 8422
Washington, DC 20590-0001

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DEPT. OF TRANSPORTATION
DOCKET

Re: Docket No. RSPA-02-12064 (HM-232) – Comment Period Extension Request

Dear Ms. Gorsky:

The purpose of this letter is to request a 60-day extension of the comment period applicable to HM-232, related to the security of hazardous materials transportation.

NPGA is the national trade association of the LP-gas (principally propane) industry with a membership of about 3,800 companies, including 39 affiliated state and regional associations representing members in all 50 states. Although the single largest group of NPGA members are retail marketers of propane gas, the membership includes propane producers, transporters and wholesalers, as well as manufacturers and distributors of associated equipment, containers and appliances. Propane gas is used in over 18 million installations nationwide for home and commercial heating and cooking, in agriculture, in industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial lift trucks.

The issues raised in the NOPR require significant analysis in order to characterize accurately the impact upon propane marketers. In particular, the proposed requirement to include the name and street address of all consignees on the shipping paper (or on an attachment thereto) will likely cause significant disruptions to the operations of a large segment of the industry's fuels delivery infrastructure. Full analysis of this and the other proposals in HM-232 require additional time to discern.

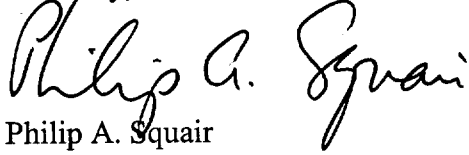
NPGA is sensitive to RSPA's desire to increase the security of hazmat shipments in the wake of the September 11th terrorist atrocities. However, the rulemaking process will ultimately benefit from rigorous analysis that can only be obtained through a coordinated and extensive outreach and education effort with industry and trade association members.

Serving the propane industry for

70 years
1931-2001

Thank you in advance for your consideration of this request. Should you have questions or require further information, please don't hesitate to contact me anytime.

Sincerely,

A handwritten signature in black ink, reading "Philip A. Squair". The signature is fluid and cursive, with the first name "Philip" being the most prominent part.

Philip A. Squair
Vice President
Regulatory and Technical Services

Cc: DOT Dockets Management System